

# Comments

# Response



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

February 27, 2012

George Cella  
Lahontan Regional Water Quality Control Board  
2501 Lake Tahoe Boulevard  
South Lake Tahoe, California 96150

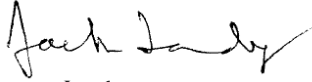
Dear Mr. *George* Cella,

The U.S. Environmental Protection Agency (EPA) has reviewed the tentative Waste Discharge Requirements (WDR) for the South Shore Fuel Reduction and Healthy Forest Restoration Project and appreciates the opportunity to provide comments. As we stated in our comments on the draft Environmental Impact Statement (EIS), we understand the urgency of the project and appreciate the challenges of conducting fuel reduction and forest restoration projects in the wildland-urban interface (WUI). We hope that our comments will ensure that project development and implementation is both effective and consistent with efforts to restore the clarity of Lake Tahoe, including the requirements of the recently approved Lake Tahoe Total Maximum Daily Load (TMDL).

We commend the Lahontan Regional Water Quality Control Board (Water Board) for including in the tentative WDR numerous best management practices and mitigation measures, and agree that the primary means of protecting water quality will be to implement them and verify that they are in proper functioning condition. We also applaud the Water Board for including appropriate project implementation, effectiveness, and forensic monitoring requirements, as well as critical bioassessment monitoring to observe the condition of downstream aquatic systems.

EPA encourages the Water Board to include an additional category of monitoring to the WDR: Lake Tahoe TMDL monitoring and load estimation. Monitoring should be carried out as necessary to conduct water quality modeling of the project area in order to estimate fine sediment loads through the date when the TMDL's interim Clarity Challenge is expected to be achieved (currently, 2026). Although protocols describing uniform pollutant load estimation methods for non-urban TMDL source categories (including the forest upland source category) are not yet available, they are expected to be developed early in the South Shore Project period. It is highly likely that the model that will be proposed for estimating forest upland loading is the Watershed Erosion Prediction Project (WEPP), which is being customized for this application within the Lake Tahoe Basin. South Shore Project monitoring should include the site-specific collection of information needed to generate model inputs (or other means of obtaining this information should be justified), and a monitoring, load estimation and reporting plan should be developed to

**US EPA-R1:** The Lake Tahoe TMDL requires load reductions from the forest upland source on a basin-wide level not by individual projects, and project-level modeling cannot be compared to the basin-wide source analysis. Water Board staff is working with the forest management agencies in the Tahoe Basin to help them devise the most applicable metrics for tracking and reporting those agencies' basin-wide load reduction efforts. The TMDL monitoring and load estimation will be done on a basin-wide scale, not on a project scale, so it is not appropriate to require project-level monitoring in a project-level permit, such as this WDR.

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<p>show how fine sediment load estimates will be calculated. The TMDL monitoring and load estimation plan should include details concerning the forest management activities that will be modeled, the scale of those activities and of the modeling thereof, sources of model input parameters, and deadlines by which load estimates will be developed and reported to the Water Board.</p> <p>If a proposed load estimation protocol is developed prior to the date of submittal of the monitoring and load estimation plan, the plan should be consistent with the protocol; otherwise, the WDR should require application of the protocol in development of the plan and submittal of loading estimates. EPA considers that TMDL monitoring and load estimation should be included in the South Shore Project WDR until such a time as the requirement is superceded by an equivalent requirement for basinwide load estimation and reporting for the forest upland source category, after which this provision can be removed from the WDR.</p> <p>Thanks again for the opportunity to comment on the WDR. If you have any questions or concerns, please contact me at (775) 589-5248 or <a href="mailto:landy.jacques@epa.gov">landy.jacques@epa.gov</a>.</p> <p>Sincerely,</p>  <p>Jacques Landy Lake Tahoe Basin Coordinator</p> <p>Cc: Sam Ziegler, USEPA Gail Louis, US EPA</p>	<div data-bbox="1142 248 2055 495" style="border: 1px solid black; padding: 10px;"> <p><b>US EPA-R2:</b> The Lake Tahoe Basin Management Unit staff is devising a template to track and report its load-affecting activities for the previous year and its activities planned for the upcoming year on a basin-wide and catchment scale, including a description of how it determined the load assessment. Because of this work, there is no need to add the requirement to the WDR.</p> </div>